

**Arent Fox** 

April 1, 2019

VIA ECFS

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Stephanie A. Joyce

Partner 202.857.6081 DIRECT stephanie.joyce@arentfox.com

Re: WC Docket No. 12-375, Annual Report of Securus Technologies, Inc. for 2018

Dear Secretary:

Securus Technologies, Inc. ("Securus"), in compliance with 47 C.F.R. § 64.6060, hereby files one (1) disk containing its Annual Report for the calendar year 2018.

In accordance with DA 19-173, Securus files this report in both a Confidential and a Public version. Enclosed herewith is the Confidential version. The Public version has been filed via ECFS in native Excel format

Geoff Boyd, Chief Financial Officer, has signed the required certification which is filed herewith and will be filed via ECFS along with this letter.

Securus also separately provides one (1) Confidential disk for Staff as a courtesy.

The Confidential version of this Annual Report is protected by DA 13-2434, because it contains sensitive, non-public data about Securus's service offerings and revenue that is protected by Commission Rule 0.459, 47 C.F.R. § 0.459. Specifically, it contains information that is both "commercial" and "financial," the disclosure of which would "result in substantial competitive harm." *Id.* § 0.459(b)(3) & (5). This information also meets the federal FOIA exemption for "trade secrets and commercial or financial information[.]" 5 U.S.C. § 552(b)(4).

Please date-stamp the enclosed copy of this letter and return it to the bearer.

Thank you for your consideration.

## **Arent Fox**

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Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.

Enclosures

ce: Gregory Capobianco, Pricing Policy Division, Wireline Competition Bureau (*via hard copy and electronic mail*)